

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CHRISTOPHER L. TUCKER,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-11-922-D
)	
(1) CITY OF OKLAHOMA CITY, a)	
municipal corporation,)	
(2) LANCE BEMO, an individual,)	
(3) JURDEN BROWN, an individual,)	
(4) MATHEW NELSON, an individual,)	
(5) JEFF COOPER, an individual,)	
(6) JOHN BLUMENTHAL, an individual,)	
)	
)	
Defendants.)	

PLAINTIFF'S WITNESS AND EXHIBIT LIST

Plaintiff hereby submits his Witness and Exhibit List as follows. Plaintiff hereby reserves the right to amend such lists as discovery continues and prior to the Pre-Trial Conference and as otherwise allowed.

1. WITNESSES:

No.	NAME AND ADDRESS	PROPOSED TESTIMONY/KNOWLEDGE
1.	Christopher Tucker c/o Blake Sonne, SONNE LAW FIRM, PLC	Deposed.
2.	Karen Hunter c/o Blake Sonne, SONNE LAW FIRM, PLC	Deposed.

3.	Lance Bemo c/o Manchester & Knight, PLLC [Expect to Call]	Deposed.
4.	Jurden Brown c/o Manchester & Knight, PLLC [Expect to Call]	Deposed.
5.	Mathew Nelson c/o Manchester & Knight, PLLC [Expect to Call]	Deposed.
6.	Lt. Jeff Cooper c/o Manchester & Knight, PLLC [Expect to Call]	Deposed.
7.	John Blumenthal c/o Manchester & Knight, PLLC [Expect to Call]	Deposed.
8.	Chief William Citty c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [Expect to Call]	Deposed.
9.	Sgt. Gamille Shockley, Oklahoma City Police Department Oklahoma City, OK [May Call]	Testimony regarding Plaintiff's injuries and related issues stemming from assault on July 3, 2010.
10.	Travis Hinton, Oklahoma City Police Department, Oklahoma City, OK [May Call]	Testimony regarding Plaintiff's injuries and the incident on July 3, 2010 with OKCPD and related issues stemming from assault on July 3, 2010.
11.	Deputy Sheriff Leon Davis, Oklahoma County Sheriff's Office, Oklahoma City, OK [May Call]	Testimony regarding Plaintiff's injuries and the incident on July 3, 2010 with OKCPD and related issues stemming from assault on July 3, 2010.

12.	Jermaine Tucker c/o SONNE LAW FIRM, PLC [May Call]	Testimony regarding Plaintiff's injuries and the incident on July 3, 2010 with OKCPD and related issues stemming from assault on July 3, 2010.
13.	Christopher Tucker, Jr. c/o SONNE LAW FIRM, PLC [May Call]	Testimony regarding Plaintiff's injuries and the incident on July 3, 2010 with OKCPD and related issues stemming from assault on July 3, 2010.
14.	Richard Smith c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [May Call]	Facts and circumstances relating to complaints made against the officers, internal investigations and communications, meetings and conversations with Plaintiff regarding complaints, and related information and testimony.
15.	Cpt. Ron Bacy c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [May Call]	Facts and circumstances relating to complaints made against the officers, internal investigations and communications, meetings and conversations with Plaintiff regarding complaints, and related information and testimony.
16.	Major John Gonshor c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [May Call]	Facts and circumstances relating to complaints made against the officers, internal investigations and communications, meetings and conversations with Plaintiff regarding complaints, and related information and testimony.
17.	Cpt. Jay Digby c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [Expect to Call]	Facts and circumstances relating to complaints made against the officers, internal investigations and communications, meetings and conversations with Plaintiff regarding complaints, and related information and testimony. Evidence relating to falsification of police reports and actions to cover up criminal activity in federal prosecution case.
18.	Jim Merz, Esq. 1330 Classen Blvd., Suite 301, Oklahoma City, OK 73106 [Expect to Call]	Evidence relating to conversations with members of OKCPD re: representation of Plaintiff and investigations with OKCPD, incident on July 3, 2010, criminal case, and related issues.

19.	Dr. David C. Crosswhite, DO, 6824 S. Western Ave. Oklahoma City, OK 73109 [May Call]	Testimony regarding treatment of Plaintiff on July 3, 2010, notation of injuries to Plaintiff and related issues stemming from assault on July 3, 2010.
20.	Dr. Afsaneh Foroozan 26 SW 104 th Oklahoma City, OK 73139 [May Call]	Testimony regarding treatment of Plaintiff on July 4, 2010, notation of injuries to Plaintiff and related issues stemming from assault on July 3, 2010.
21.	Officer Phillip Martin c/o Municipal Counselor's Office, 200 N. Walker Oklahoma City, OK 73102 [Expect to Call]	Testimony regarding incident on July 3, 2010 with Plaintiff, his report, and related issues.
22.	Michael W. Oak Creek Apartments 5909 S Lee Ave, Oklahoma City, OK 73109 [May Call]	Issues relating to incident at apartment complex on July 3, 2010, report of incident and related issues.
23.	Kelvin Adams Spencer Police Department 8300 NE 36th St, Spencer, OK 73084 [May Call]	Testimony regarding Plaintiff's injuries and related issues stemming from assault on July 3, 2010.
24.	Additional witnesses for credibility of Jay Digby relating to involvement in criminal activity and falsification of reports.	
25.	All records custodians and other witnesses necessary to authenticate exhibits	
26.	All witnesses listed by Defendants, not otherwise objected to by Plaintiff.	
27.	Plaintiff's rebuttal witnesses and other witnesses identified as discovery progresses.	

2. EXHIBITS:

<u>NO.</u>	<u>TITLE:</u>
1.	Oklahoma City's Laws of Arrest Policy
2.	Oklahoma City's Taser (Less Lethal Devices) Policy
3.	Oklahoma City's Mechanics of Arrest Policy
4.	Oklahoma City's Use of Force Policy
5.	Oklahoma City's Custody and Control Policy
6.	Oklahoma City's Concepts of Probable Cause Policy
7.	Oklahoma City's Vehicle Pullover Policy
8.	Oklahoma City's Use of Force Rule
9.	Oklahoma City's Arrest Procedures
10.	Oklahoma City's Personnel Investigations Policy
11.	Officer Bemo's Police Report
12.	Officer Bemo's Probable Cause Affidavit
13.	Officer Nelson's Supplemental Narrative Report
14.	Officer Martin's Supplemental Narrative Report
15.	Officer Brown's Supplemental Narrative Report
16.	Report of Bemo's Taser Use
17.	Relevant portions of Lt. Cooper's Use of Force Report
18.	Relevant Portions of Email from Jay Digby to John Gonshor, dated July 8, 2010

19.	Relevant Portions of Document from Cpt. Bacy dated January 10, 2011
20.	OKC Emails/Correspondence relating to internal investigation of incident with Plaintiff.
21.	Relevant Excerpts of Personnel Files for Individual Defendants with the City of Oklahoma City.
22.	Reports or investigations of previous instances or complaints of excessive force by Individual Defendants.
23.	Any and all of Defendants' emails, letters, correspondence, investigation notes, reports, etc., relating to Plaintiff and incident that occurred on July 3, 2010.
24.	Relevant portions of ER Report by Dr. David Crosswhite, DO
25.	Photos of Plaintiff's body and injuries, including burn marks following tasing by officers.
26.	Relevant portions of ER Report by Dr. Afsaneh Foroozan
27.	Formal Citizen Complaint by Christopher Tucker
28.	Formal Citizen Complaint by Karen Hunter.
29.	Evidence relating to previous criminal conviction of assault and battery by Defendant Blumenthal and continued employment record of Blumenthal following guilty plea.
30.	Evidence and related reports and documentation relating to homicide and tasing of Lamont Falls in OKC police custody.
31.	Evidence and related reports and documentation relating to homicide and tasing of Demetrius Johnson in OKC police custody.
32.	Evidence and related reports and documentation relating to OKC's Taser policies including risk of causing heart attacks and other heart problems.

33.	Relevant portions of Plaintiff's medical records from treatment following attack on July 3, 2010.
34.	Plaintiff's medical records and notes from hand surgery prior to July 3, 2010 incident.
35.	Oak Creek Apartments security guard report.
36.	OKCPD Incident Detail Report of July 3, 2010
37.	Plaintiff's CLEET License
38.	Relevant Portions of other OKCPD policies and procedures
39.	Actual TASER used during incident on July 3, 2010 or similar TASER model.
40.	Recording of three 911 Calls from Karen Hunter on July 3, 2010
41.	Exhibits offered in rebuttal by Plaintiff.
42.	Any and all Exhibits produced by Defendants not objected to by Plaintiff.
43.	Exhibits listed by Defendants, not otherwise objected to by Plaintiff.
44.	Exhibits identified in discovery.
45.	Discovery Responses from Defendants
46.	Documents yet to be produced by Defendants per discovery requests.
47.	Summaries/Demonstrative Exhibits
48.	All documents produced via subpoena or third parties

Respectfully submitted,

s/Blake Sonne

Blake Sonne, OBA #20341

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2014, I electronically transmitted the above document to the Clerk of the Court using the ECF filing System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Susan Ann Knight

Stacey Haws Felkner

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Oklahoma City, OK 73102

(405) 235-4671

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ATTORNEYS FOR DEFENDANTS BEMO, BROWN, & NELSON

s/Blake Sonne